#### IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS MIDLAND-ODESSA DIVISION

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§	CASE NO. 7:20-CV-00113-DC
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#### PLAINTIFF'S DESIGNATION OF DEPOSITION EXCERPTS

NOW COMES, TERRY MEEKS, Plaintiff in the above-styled and numbered cause and files this his designation of deposition excerpts.

I.

Should any witness be unavailable and/or Defendants' counsel designate portions of any witnesses' depositions other than those designated herein, Plaintiff expressly reserves the right to supplement this designation with testimony which at this time cannot be anticipated.

Π.

Should any party configuration change or different theories of liability or defenses emerge, this Plaintiff reserves the right to amend or supplement these designations.

III.

This Plaintiff specifically anticipates using the following videotaped deposition testimony at the time of trial. These depositions are scheduled to be taken by agreement or the transcript has not been received yet.

#### A. Deposition of Frank Kuwamura, III

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To be determined.

# B. Deposition of Dr. Warren F. Neely

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To be determined.

## C. Deposition of Defendant IBN Uthman Kearse

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To be determined.

## D. Deposition of Corporate Representative of Cameron Logistics, LLC

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To be determined.

Respectfully Submitted,

Paul L. Sadler

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ATTORNEYS FOR PLAINTIFF

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all counsel in accordance with the Texas Rules of Civil Procedure on this the of February, 2022.

### Via e-service

Leonard R. (Bud) Grossman

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